

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/14/2019

1 IN THE UNITED STATES DISTRICT COURT
 2
 3

4 FOR THE SOUTHERN DISTRICT OF NEW YORK
 5
 6

7 D. GEORGE SWEIGERT
 8
 9

vs.
 Plaintiff,

JASON GOODMAN,
 10
 11

Defendant
 12
 13

Case No.: 1:18-cv-08653-VEC-SDA
 14
 15

MOTION FOR LEAVE TO EXTEND TIME
 TO RESPOND TO SECOND AMENDED
 COMPLAINT WITH COUNTERCLAIM
 AND THIRD-PARTY COMPLAINT
 16
 17

**MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO SECOND AMENDED
 COMPLAINT WITH COUNTERCLAIM AND THIRD-PARTY COMPLAINT**

18 Defendant, Jason Goodman, Pro Se moves this Honorable Court for an extension of time
 19 to file a response to the Second Amended Complaint filed by Plaintiff, D. George Sweigert
 20 ("Plaintiff") which will include an amended counterclaim and a new third party complaint, and
 21 states as follows:

22 1. The non-party Steve Outtrim is a known associate of Plaintiff. In the past,
 23 Outtrim has participated in coordinated activities with Plaintiff intended to disrupt
 24 Goodman's business, personal life and legal Defense. In the Virginia suit, (Steele
 25 v Goodman 3:17-cv-00601-MHL) Outtrim wrote a declaration in support of
 26 Plaintiff's motion to intervene. The motion was denied as the court in Virginia
 27 recognized the frivolous nature of their claims and their attempt to abuse the legal
 process. Outtrim's inappropriate email of November 7, 2019 represents a
 demonstration of pattern and practice of frivolous intervention attempts and abuse
 of process intended to increase these proceedings.

28 MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO SECOND AMENDED COMPLAINT WITH
 COUNTERCLAIM AND THIRD-PARTY COMPLAINT - 1

- 1 2. This new development has underlying causes and consequences that have given
- 2 rise to the need for a counterclaim against Plaintiff and a third-party complaint
- 3 against Outtrim.
- 4 3. Defendant had no way of anticipating this new development would occur in such
- 5 close proximity to the filing deadline.
- 6 4. The filing of the motion for leave was delayed one day by the Veteran's Day
- 7 holiday closure of the court on Monday November 11.
- 8 5. Plaintiff has been granted liberal leave by the court to file, refile, amend and re-
- 9 amend numerous motions and pleadings throughout the course of this matter. In
- 10 the interest of serving equal justice, Defendant's motion should be granted.
- 11 6. No party would be prejudiced by the extension.
- 12 7. The time to respond has not expired.

15 WHEREFORE, Defendant, Jason Goodman, hereby requests that the Court enter an
16 Order (1) granting her Motion for an Extension of Time; (2) providing Defendant with an
17 extension of time to file his response to the Second Amended Complaint with counterclaim and
18 third party complaint until on or before November 21, 2019; and (3) awarding Defendant such
19 further relief as the Court deems appropriate.

20

21

22

23

24

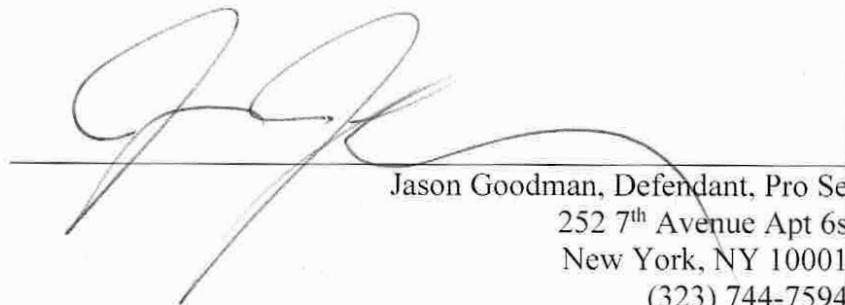
25

26

27

1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.
2 Further, I hereby attest that the attached exhibits are accurate and true copies of source
3 documents as described.
4

5 Signed this 14 day of November 2019

6
7
8
9 
10 Jason Goodman, Defendant, Pro Se
11 252 7th Avenue Apt 6s
12 New York, NY 10001
13 (323) 744-7594
14 truth@crowdsourcethetruth.org

15 Defendant's request is GRANTED IN PART and DENIED IN PART. The deadline to respond
16 to the Second Amended Complaint is extended to Monday, November 18, 2019.

17 Defendant must seek leave to file a third-party complaint, pursuant to Federal Rule of
18 Civil Procedure 14. If Defendant has a good-faith basis to seek such leave, he shall file a
19 motion for leave on or before November 29, 2019.

20 SO ORDERED.

21 Dated: November 14, 2019

22 

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2019, a true copy of the foregoing was sent via email to the following:

D. George Sweigert
C/O General Delivery
Rough & Ready, CA 95975

Signed this 14 day of November 2019



Jason Goodman, Defendant, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594
truth@crowdsourcethetruth.org